

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

NORTH AMERICAN SOCCER LEAGUE, LLC,

Plaintiff,

v.

UNITED STATES SOCCER FEDERATION,
INC., and MAJOR LEAGUE SOCCER, L.L.C.,

Defendants.

Civil Action No. 1:17-cv-05495-HG

**STIPULATION AND ORDER
REGARDING MATTERS TO
EXCLUDE AT TRIAL**

WHEREAS, trial in the above-captioned action (the “Action”) is scheduled for January 6, 2025;

WHEREAS, Plaintiff North American Soccer League, LLC (“NASL”), Defendant United States Soccer Federation, Inc. (“U.S. Soccer”), and Defendant Major League Soccer, L.L.C. (“MLS”) wish to cooperate in developing efficient means of addressing certain issues which would otherwise be the subject of motions in limine by a parties or parties to this Action (collectively, the “Parties,” and each individually a “Party”);

WHEREAS, the governing scheduling order in the Action provides that the Parties must file motions in limine on November 4, 2024; and

WHEREAS, the parties have met and conferred to discuss potential resolutions of the Parties’ anticipated motions in limine;

NOW, THEREFORE, IT IS HEREBY STIPULATED, by the undersigned counsel on behalf of the Parties, that during trial before the jury in this case:

1. The Parties will not refer to or discuss any of the motions for summary judgment in this case or the outcomes thereof, including but not limited to the fact that certain Counts were or were not permitted to proceed to trial. Notwithstanding the foregoing, the Parties may refer to the fact that NASL will or will not present certain types of evidence or argument concerning the Professional League Standards, as described further in the Court's Order dated October 28, 2024, ECF No. 451.
2. The Parties will not refer to or discuss the cases of *Fraser v. Major League Soccer*, 97 F. Supp. 2d 130 (D. Mass. 2000), *Championsworld L.L.C. v. United States Soccer Federation, Inc.*, No. 2006-cv-05724, Doc. 184 (N.D. Ill. 2010), and *Relevant Sports, LLC v. United States Soccer Federation Inc.*, No. 1:19-cv-08359 (S.D.N.Y), or any other litigation alleging a conspiracy involving MLS and U.S. Soccer, or the fact that any attorney or law firm served as counsel in any other case brought against any Party to this litigation; provided that this provision does not prevent any Party from using any exhibit or other document that references a prior litigation or previously was used as an exhibit in such a prior litigation.
3. The Parties will not refer to or discuss any past instance in which an attorney or law firm involved in the present litigation has represented one of the Parties to the present litigation or its affiliate; provided that this provision does not prevent a Party from using an exhibit or other document merely because it references such an attorney or law firm and its representation.

For the avoidance of doubt, this Order does not prevent any Party from presenting any matter to the Court outside of the presence of the jury.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: November 12, 2024

/s/ Hector Gonzalez
HON. HECTOR GONZALEZ
U.S. DISTRICT COURT JUDGE

Respectfully submitted,

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